## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 15-11089TPA

JEFFREY MARTIN FELDMILER and

SANDRA LEE FELDMILLER, his wife, : HON. THOMAS P. AGRESTI

Debtor

:

DITECH FINANCIAL, LLC, : CHAPTER 13

Movant, :

RELATED TO CLAIM NO.

.

JEFFREY MARTIN FELDMILER and SANDRA LEE FELDMILLER, his wife; and RONDA J. WINNECOUR, ESQUIRE,

CHAPTER 13 TRUSTEE,

Respondents.

v.

## **DECLARATION**

I hereby certify as counsel for the Debtor that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

BY: /s/Michael S. JanJanin

Michael S. Jan Janin, Esquire

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Counsel for Debtors, Jeffrey Martin Feldmiller

and Sandra Lee Feldmiller

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## CERTIFICATE OF SERVICE OF DECLARATION

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on October 22, 2019

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: *Electronic Notification via the CM/ECF System.* 

Ronda J. Winnecour, Esquire, Chapter 13 Trustee cmccf@chapter13trusteewdpa.com

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: October 22, 2019

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

BY: /s/Michael S. JanJanin

Michael S. Jan Janin, Esquire

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